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March 23, 2011

VIA EMAIL AND US MAIL

John C. Bazaz, Esq.
Surovell Isaacs Petersen & Levy PLC
4010 University Drive, 2nd Floor
Fairfax, Virginia 22030

Re: Alisha Wilkes v. GMAC Mortgage, LLC et al
Case No.: 1:10-cv-1160

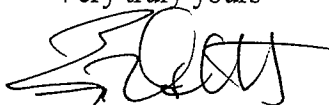
Dear Mr. Bazaz:

Enclosed please find GMAC Mortgage, LLC's First Supplemental Rule 26(a)(1) Disclosures.

We disagree with your co-counsel's assertions as to what is required under Rule 26(a)(1). Nonetheless, we trust this will resolve the issues raised by Mr. Bennett in his electronic correspondence of March 18, 2011 and March 22, 2011.

Please do not hesitate to contact me should you have any questions.

Very truly yours



Ethan G. Ostroff

Enclosures

cc: Matthew Erasquin, Esq.
Leonard Bennett, Esq.
David Anthony, Esq.
Brian Casey, Esq.
Jason Hamlin, Esq.
Turkessa Bynum Rollins, Esq.
Grant Kronenberg, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ALISHA W. WILKES,

Plaintiff,

v.

GMAC MORTGAGE, LLC, et al.,

Defendants.

Civil No. 1:10-cv-01160 (CMH-TRJ)

**DEFENDANT GMAC MORTGAGE, LLC'S FIRST SUPPLEMENTAL
RULE 26(a)(1) DISCLOSURES**

Defendant GMAC Mortgage, LLC ("GMAC"), by counsel, submits the following First Supplemental Rule 26(a)(1) Initial Disclosures.

(A) Provide the name, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

1. The Plaintiff is believed to possess information concerning the allegations made in their Complaint and Defendant's Answer.

Alisha Wilkes
18018 Densworth Mews
Gainesville, VA 20155
Phone Unknown

2. GMAC Mortgage, LLC has information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer. Employees may also have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer:

GMAC Mortgage, LLC, c/o
John C. Lynch (VSB No. 39267)
Ethan G. Ostroff (VSB No. 71610)
Elizabeth S. Flowers (VSB No. 78487)
Counsel for GMAC Mortgage, LLC
TROUTMAN SANDERS LLP
222 Central Park Avenue, Suite 2000
Virginia Beach, VA 23462
Telephone: (757) 687-7765
Facsimile: (757) 687-1504

SUPPLEMENTAL RESPONSE:

GMAC Mortgage, LLC's corporate representative, Michael Bennett, Senior Litigation Analyst, employed by GMAC Mortgage, LLC, has knowledge concerning the allegations at issue in the Complaint and GMAC Mortgage, LLC's defenses.

GMAC Mortgage, LLC, c/o
John C. Lynch (VSB No. 39267)
Ethan G. Ostroff (VSB No. 71610)
Elizabeth S. Flowers (VSB No. 78487)
Counsel for GMAC Mortgage, LLC
TROUTMAN SANDERS LLP
222 Central Park Avenue, Suite 2000
Virginia Beach, VA 23462
Telephone: (757) 687-7765
Facsimile: (757) 687-1504

3. Western Sierra Acceptance Corp. may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Western Sierra Acceptance Corp.
1547 Palo Verdes #264
Walnut Creek, CA 94597
(888) 829-1153

4. DCFS USA, LLC may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

DCFS USA, LLC
27777 Inkster Rd.
Farmington, MI 48334

Phone Unknown

5. Credit Infonet, Inc. may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Credit Infonet, Inc.
4540 Honeywell Court
Dayton, OH 45424
(866) 218-1003

6. Credit One Bank, NA may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Credit One Bank, NA
P.O. Box 98873
Las Vegas, NV 89193-8873
1-877-825-3242

7. FAMS/One Technologies may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

FAMS/One Technologies
Address and Phone number unknown

8. National Future Mortgage, Inc. may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

National Future Mortgage, Inc.
2 Eastwick Dr. Suite 300
Gibbsboro, NJ 08026
(800) 291-7900

9. America Funding, Inc. may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

America Funding, Inc.
5930 Cornerstone Court West, Suite 350
San Diego, CA 92121
(800) 618-3006

10. Nationstar Mortgage, LLC may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Nationstar Mortgage, LLC
350 Highland Dr.
Lewisville, TX
(888) 480-2432

11. Experian Information Solutions, Inc may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Experian Information Solutions, Inc.
P.O. Box 2002
Allen, TX 75013
(888) 397-3742

12. Trans Union, LLC may have information regarding the allegations made in Plaintiff's Complaint and in GMAC's Answer.

Trans Union, LLC
1561 E. Orangethorpe Ave.
Fullerton, CA 92831
(714) 738-3800

13. Scott A. Weible may have information regarding GMAC's defenses.

Scott A. Weible
Scott Alan Weible, P.L.L.C.
The Haymarket Professional Building
14540 John Marshall Highway, Suite 201
Gainesville, VA 20155-1693
Email: scott@weible.com

14. The persons, entities or creditors who extended Plaintiff credit have knowledge regarding Plaintiff's applications, Plaintiff's credit history, the reasons Plaintiff was granted credit and any communications or correspondence between them and Plaintiff. The names, addresses and telephone numbers, if known, of the persons, entities or creditors who have

extended credit to the Plaintiff are contained, at least in part, in the Trans Union documents produced in its initial disclosures.

15. The persons and entities with whom Plaintiff has applied for credit have knowledge regarding Plaintiff's applications, Plaintiff's credit history, the reasons Plaintiff was granted or denied credit, and any communications or correspondence between them and Plaintiff. The names, addresses and telephone numbers, if known, of the persons, entities or creditors with whom Plaintiff has applied for credit are contained, at least in part, in the Trans Union documents produced in its initial disclosures.

16. The persons and entities who have reviewed Plaintiff's credit reports have knowledge regarding their communications and correspondence with Plaintiff and the reasons that they reviewed Plaintiff's credit reports and the contents of Plaintiff's credit reports. The names, addresses and telephone numbers, if known, of the persons, entities or creditors who have reviewed Plaintiff's credit reports are contained, at least in part, in the Trans Union documents produced in its initial disclosures.

(B) A copy of, or description by category and location of, all documents, data compilations, and tangible things in your possession, custody or control that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

GMAC identifies the following category of documents that are in its possession, custody or control: the loan file, account notes, correspondence and payment history.

In addition, GMAC may use any document produced by plaintiff, other defendants, or obtained from third-parties through discovery.

GMAC reserves the right to supplement as applicable documents are made known to defense counsel. GMAC reserves the right to object to the production of any documents described above on any basis permitted by the *Federal Rules of Civil Procedure*.

(C) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or a description by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

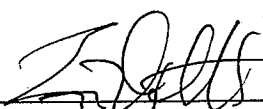
GMAC is not claiming any damages against Plaintiff at this time.

(D) Attach for inspection and copying as required under Fed. R. Civ. P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments to satisfy the judgment.

No such policy exists.

Dated this 23rd day of March, 2011.

GMAC MORTGAGE, LLC

By: 
Of Counsel

John C. Lynch (VSB No. 39267)
Ethan G. Ostroff (VSB No. 71610)
Elizabeth S. Flowers (VSB No. 78487)
Counsel for GMAC Mortgage, LLC
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E-mail: liz.flowers@troutmansanders.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ALISHA W. WILKES,

Plaintiff,

V.

GMAC MORTGAGE, LLC, et al.,

Defendants.

Civil No. 1:10-cv-01160 (CMH-TRJ)

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of March, 2011, I sent a true and correct copy of the foregoing First Supplemental Rule 26(a)(1) Disclosures, via email and first class mail, postage prepaid, to the following counsel of record:

Counsel for Plaintiff

John C. Bazaz, Esq.
Surovell Isaacs Petersen & Levy PLC
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Fairfax, Virginia 22030
E-mail: jbazaz@sipflfirm.com

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E-mail: lenbennett@cox.net

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Consumer Litigation Assoc PC
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
E-mail: matt@clalegal.com

Counsel for Defendant GMACM Information Solutions, Inc.

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Richmond, Virginia 23218-1122
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Counsel for Defendant Trans Union, LLC

Grant Edward Kronenberg
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Richmond, Virginia 23218
E-mail: gkronenberg@morrisismorris.com



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